



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

June 20, 2012

William Hofert
Controller and Acting Regulatory Manager
DeVilbiss Automotive Refinishing
11360 S. Airfield Rd.
Swanton, OH 43558

Re: Use of the DeVilbiss TEKNA Pro spray gun with TE 20 air cap and TEKNA ProLite spray gun with TE 20 air cap in Rhode Island automobile refinishing facilities.

Dear Mr.Hofert:

The Rhode Island Department of Environmental Management's Office of Air Resources (OAR) has reviewed the information contained in a submittal by DeVilbiss Automotive Refinishing, including a "Final Report" entitled "Evaluation of the DeVilbiss TEKNE PRO (and TEKNA Pro Lite) for use as equivalent technology to HVLP, as defined in 40 CFR 63.11173(e)" and letters from the SCAQMD, for the approved use of the DeVilbiss TEKNA Pro and Pro Lite spray guns. Air Pollution Control Regulation No. 30 "Control of Volatile Organic Compounds from Automobile Refinishing Operations", specifically section 30.4 *Equipment Specifications*, requires that persons engaging in automobile refinishing, specifically the application of coatings with a spray gun, utilize ... *electrostatic application equipment (30.4.1(a)), ... High Volume Low Pressure(HVLP) spray equipment (30.4.1(b)), or ... another type of application which achieves a transfer efficiency of at least 65% and has been approved by the Director(30.4.1(c))*. Based on the review of the information submitted the OAR has determined that the DeVilbiss TEKNA Pro and Pro Lite spray guns equipped with a TE 20 air cap (TEKNA Pro and Pro Lite) have a demonstrated transfer efficiency greater than or equal to 65% when applying color coatings and clearcoats. Therefore, the use of these two spray guns is approved by the Director when used as follows:

1. The DeVilbiss TEKNA Pro and Pro Lite spray guns are only approved for the application of color coatings and clearcoats in automobile refinishing facilities in RI.
2. This approval is only valid if the air pressure supplied to the DeVilbiss TEKNA Pro and Pro Lite spray guns is equal to or less than 26 psig. DeVilbiss

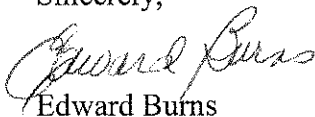


Automotive Refinishing shall supply written notification with each DeVilbiss TEKNA Pro and Pro Lite spray gun sold or distributed for use within RI that the maximum air pressure supplied to the spray gun shall not exceed 26 psig.

3. DeVilbiss Automotive Refinishing shall supply a 100 psig (full scale) mechanical pressure gauge with markings every 2 psig or a 160 psig (full scale) digital pressure gauge that measures in 1 psig increments with each DeVilbiss TEKNA Pro and Pro Lite spray gun sold or distributed for use within RI. DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss TEKNA Pro and Pro Lite spray gun sold or distributed for use within RI that the pressure gauge shall be attached to the spray gun and be in good working condition whenever the spray gun is in operation.
4. This approval is only valid if during actual operation the DeVilbiss TEKNA Pro and Pro Lite spray gun(s) is equipped with a properly operating pressure gauge that meets the criteria specified in condition no. 3.
5. All DeVilbiss TEKNA Pro and Pro Lite spray guns sold or distributed for use within RI shall have a clearly visible permanent label on the spray gun air cap that specifies the air cap designation as TE 20 and that the inlet air pressure shall not exceed 26 psig .
6. All DeVilbiss TEKNA Pro and Pro Lite spray guns sold or distributed for use within RI shall have a clearly visible permanent label on the spray gun body identifying that the gun body is a DeVilbiss TEKNA Pro or Pro Lite spray gun.
7. This approval is only valid if during the actual operation the DeVilbiss TEKNA Pro and Pro Lite spray guns are labeled as described in condition numbers 5 and 6.
8. This approval is only valid for the DeVilbiss TEKNA Pro and Pro Lite spray gun models tested.

If you have any questions regarding this approval, please call me at (401) 222-2808 ext. 7013 or send me an e-mail at ted.burns@dem.ri.gov.

Sincerely,


Edward Burns

Supervising Air Quality Specialist
RIDEM, Office of Air Resources

cc: Ronald Gagnon, Chief, RIDEM, Office of Customer and Technical Assistance



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William Hofert
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11360 S. Airfield Rd.
Swanton, OH 43558

Re: Use of the DeVilbiss TEKNA Pro spray gun with TE 10 air cap and TEKNA ProLite spray gun with TE 10 air cap in Rhode Island automobile refinishing facilities.

Dear Mr.Hofert:

The Rhode Island Department of Environmental Management's Office of Air Resources (OAR) has reviewed the information contained in a submittal by DeVilbiss Automotive Refinishing, including a "Final Report" entitled "Evaluation of the DeVilbiss TEKNE PRO (and TEKNA Pro Lite) for use as equivalent technology to HVLP, as defined in 40 CFR 63.11173(e)" and letters from the SCAQMD, for the approved use of the DeVilbiss TEKNA Pro and Pro Lite spray guns. Air Pollution Control Regulation No. 30 "Control of Volatile Organic Compounds from Automobile Refinishing Operations", specifically section 30.4 *Equipment Specifications*, requires that persons engaging in automobile refinishing, specifically the application of coatings with a spray gun, utilize ... *electrostatic application equipment (30.4.1(a)), ... High Volume Low Pressure(HVLP) spray equipment (30.4.1(b)), or ... another type of application which achieves a transfer efficiency of at least 65% and has been approved by the Director(30.4.1(c))*. Based on the review of the information submitted the OAR has determined that the DeVilbiss TEKNA Pro and Pro Lite spray guns equipped with a TE 10 air cap (TEKNA Pro and Pro Lite) have a demonstrated transfer efficiency greater than or equal to 65% when applying color coatings and clearcoats. Therefore, the use of these two spray guns is approved by the Director when used as follows:

1. The DeVilbiss TEKNA Pro and Pro Lite spray guns are only approved for the application of color coatings and clearcoats in automobile refinishing facilities in RI.
2. This approval is only valid if the air pressure supplied to the DeVilbiss TEKNA Pro and Pro Lite spray guns is equal to or less than 35 psig. DeVilbiss




Automotive Refinishing shall supply written notification with each DeVilbiss TEKNA Pro and Pro Lite spray gun sold or distributed for use within RI that the maximum air pressure supplied to the spray gun shall not exceed 35 psig.

3. DeVilbiss Automotive Refinishing shall supply a 100 psig (full scale) mechanical pressure gauge with markings every 2 psig or a 160 psig (full scale) digital pressure gauge that measures in 1 psig increments with each DeVilbiss TEKNA Pro and Pro Lite spray gun sold or distributed for use within RI. DeVilbiss Automotive Refinishing shall supply written notification with each DeVilbiss TEKNA Pro and Pro Lite spray gun sold or distributed for use within RI that the pressure gauge shall be attached to the spray gun and be in good working condition whenever the spray gun is in operation.
4. This approval is only valid if during actual operation the DeVilbiss TEKNA Pro and Pro Lite spray gun(s) is equipped with a properly operating pressure gauge that meets the criteria specified in condition no. 3.
5. All DeVilbiss TEKNA Pro and Pro Lite spray guns sold or distributed for use within RI shall have a clearly visible permanent label on the spray gun air cap that specifies the air cap designation as TE 10 and that the inlet air pressure shall not exceed 35 psig .
6. All DeVilbiss TEKNA Pro and Pro Lite spray guns sold or distributed for use within RI shall have a clearly visible permanent label on the spray gun body identifying that the gun body is a DeVilbiss TEKNA Pro or Pro Lite spray gun.
7. This approval is only valid if during the actual operation the DeVilbiss TEKNA Pro and Pro Lite spray guns are labeled as described in condition numbers 5 and 6.
8. This approval is only valid for the DeVilbiss TEKNA Pro and Pro Lite spray gun models tested.

If you have any questions regarding this approval, please call me at (401) 222-2808 ext. 7013 or send me an e-mail at ted.burns@dem.ri.gov.

Sincerely,


Edward Burns

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